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Attorneys for Felisa Wilson, George Martinez, and Yarrow Silvers

IN THE SUPREME COURT FOR THE STATE OF ALASKA

In the Matter of the 2021)	
Redistricting Cases)	Supreme Court Case No. S-18332
(Matanuska-Susitna Borough, S-18328))	
(City of Valdez, S-18329))	(S-18328, S-18329, S-18330,
(Municipality of Skagway, S-18330))	S-18332 consolidated)
(Alaska Redistricting Board, S-18332))	
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Trial Court No. 3AN-21-08869CI)	

EAST ANCHORAGE PLAINTIFFS'
MOTION TO ACCEPT OVERLENGTH RESPONSE BRIEF

COME NOW Felisa Wilson, George Martinez, and Yarrow Silvers (collectively, the “East Anchorage Plaintiffs”), by and through undersigned counsel, and hereby move the Court for leave to file an over-length Response to the Board’s Petition for Review. This Motion is supported by the attached Declaration of Zoe A. Danner.

In accordance with the Court’s Scheduling Notice dated February 22, 2022, responses that exceed 50 pages must be accompanied by a motion to accept over-length briefs. The over-length Response to Petition for Review is necessitated by the underlying points on appeal and the subject matter, which calls into question

the legal and factual basis of the Board's plan as accepted by the trial court's final order. The Response necessarily includes a detailed discussion of the legal standards and relevant facts, which could not be fully provided to this Court in a pleading limited to 50 pages.

DATED this 10th day of March, 2022.

BIRCH HORTON BITTNER & CHEROT

By: /s/ Zoe A. Danner

Holly C. Wells, ABA #0511113

Mara E. Michaletz, ABA #0803007

Zoe A. Danner, ABA #1911094

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DECLARATION OF ZOE A. DANNER

STATE OF ALASKA)
) ss:
Third Judicial District)

The undersigned Zoe A. Danner, being first duly sworn upon oath, deposes and states:

1. I am an attorney with the firm of Birch Horton Bittner & Cherot, counsel for Plaintiffs Felisa Wilson, George Martinez, and Yarrow Silvers (“East Anchorage Plaintiffs”) in the above-entitled action.

2. East Anchorage Plaintiffs' Response to the Board's Petition for Review ("Response"), filed concurrently herewith, is approximately 75 pages, inclusive of the cover sheet and tables.

3. Counsel has made diligent efforts to reduce the length of the Response, but the Response has necessarily expanded beyond the 50-page limit set forth in the Scheduling Notice dated February 22, 2022.

4. The Response is in defense of the Board's 77-page Petition and includes responses to the points on appeal and an extensive discussion of law and facts relevant to these proceedings.

UNDER PENALTY OF PERJURY, I declare the statements herein are true to the best of my knowledge, information and belief.

DATED this 10th day of March, 2022.

BIRCH HORTON BITTNER & CHEROT

By: /s/ Zoe A. Danner
Holly C. Wells, ABA #0511113
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[PROPOSED]
ORDER GRANTING MOTION TO ACCEPT OVERLENGTH RESPONSE

This Court, having considered the East Anchorage Plaintiffs' Motion for Leave to File Overlength Response Brief and Declaration in support thereof, and any responses thereto, and being fully apprised,

HEREBY ORDERS that the motion is GRANTED.

DATED this ____ day of March, 2022.

Justice _____